



NJDEP Air Quality Permitting Transformation  
Workgroup Setup and Stakeholder Comments from February 17, 2011 Meeting



Workgroup # 1: Public Health Protection

Tasks	Rating <sup>1</sup>
1(a). There is a need for the Department to make emission data available in a form readily understandable by the public.	C
1(b). On its own initiative, the Department should develop a community-wide cumulative impact analysis, including minor sources.	C
1(c). The Department should make effort to identify facilities and emission points without permits, particularly in Environmental Justice areas.	D*
1(d). The Department should review the current applicability threshold and revise it based upon latest scientific information.	C
1(e). The cumulative risk analysis and health risk assessment process should be developed prior to applying it to the permitting process.	C
1(f). Minor source permit renewals should be screened; selected minor source renewals should receive a detailed review and enforcement inspection.	C

NJDEP/AQPP Members

Frank Steitz (Lead)		
Joel Leon		
Olga Boyko		

External Stakeholder Members


<sup>1</sup> Rating

A: Ready to Go      B: Desirable/Minor Effort      C: Desirable/Major Effort      D: Low Yield

D\*: Needs Referral to Air Compliance and Enforcement



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**Workgroup # 2: Permit Structure and Process**

Tasks	Rating <sup>1</sup>
2(a). There is a need to look at other states' permit format for improvements to NJDEP's and make the permits more user friendly and easy to understand by public, industry and enforcement.	A
2(b). Consider streamlining permits by only including the most stringent requirements.	A
2(c). Monitoring and recordkeeping requirements should be simplified. Duplicative or redundant monitoring should be eliminated. Monitoring not specified in rule should not be specified in the permit. While revisiting permit requirements for minor sources, include critical requirements for environmental quality without overburdening the recordkeeping and monitoring requirements.	C
2(d). Level of monitoring should be proportioned to history of enforcement compliance. Identify facilities in good standing. Provide incentives to facilities with a good compliance history by offering a reduced permitting burden.	C
2(e). Incorporate by reference.	B
2(f). Permit application supplemental information, not directly related to emissions, should not become permit requirements.	B
2(g). Redefine what an insignificant source in NJ Title V program is.	C
2(h). Hold on-site pre/post application meetings.	B
2(i). Offer Plant-wide Applicability Limits (PAL).	D
2(j). Develop General Operating Permits (GOP). Otherwise make equipment that is currently eligible for general permits, insignificant Title V sources (see 2(g) above)	C
2(k). Shorten the processing time for permit approval. Refocus the permit review effort.	B
2(l). Classify more significant modifications as minor modifications.	C
2(m). Minimize the number of appeals.	C

**NJDEP/AQPP Members**

Bachir Bouzid (Lead)	Khawar Kalim	
Robert Kettig	Mike Adhanom	
Kevin Greener		

**External Stakeholder Members**

Pradeep Lamba		

<sup>1</sup> Rating

A: Ready to Go

B: Desirable/Minor Effort

C: Desirable/Major Effort

D: Low Yield



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Workgroup # 3: Better Technology and Cost Effectiveness

Tasks	Rating <sup>1</sup>
3(a). Air Permitting should adopt a policy of ratcheting down emissions similar to the water program.	C
3(b). The Department should clarify the process for case by case state of the art analysis, presumptive norms etc.	B
3(c). The Department should establish cost effectiveness thresholds when developing RACT, SOTA etc.	C
3(d). Health costs should be included in any effectiveness analysis.	C

NJDEP/AQPP Members

Frank Steitz (Lead)		
Peg Gardner		

External Stakeholder Members


<sup>1</sup> Rating

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Workgroup # 4: Fees

Tasks	Rating <sup>1</sup>
4(a). Air Quality Permitting Program needs to be openly evaluated and made more efficient.	C
4(b). Once an appropriate program level has been identified through (a) above, an appropriate funding mechanism need be developed.	C

NJDEP/AQPP Members

John Preczewski (Lead)		
Khawar Kalim		
Ketan Bhandutia		

External Stakeholder Members


<sup>1</sup> Rating

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Workgroup # 5: Stack Testing

Tasks	Rating <sup>1</sup>
5(a). Stack testing will be evaluated under NJDEP's Bureau of Technical services (Michael Klein) and not as part of this external stakeholder's group effort.	* See Below

NJDEP/AQPP Members

Michael Klein (Lead)		

External Stakeholder Members


<sup>1</sup> Rating

A: Ready to Go      B: Desirable/Minor Effort      C: Desirable/Major Effort      D: Low Yield

\* Removed to an independent external stake holder workgroup. If interested in the subject of stack testing, please advise John Preczewski.